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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Vita-Mix Corporation, Vita-Mix
Management Corporation, and Vita-Mix
Manufacturing Corporation,

Plaintiffs,

v.

Vevor Corporation, Vevor Inc., Vevor
Store Inc., HK Sishun Trade Co.,
Sanven Corporation, Sanven
Technology Ltd., Shanghai Sishun E-
commerce Co., Ltd, Shanghai Sishun
Mechanical Equipment Co., Ltd.,
Wildfiore Ltd, Rubao Jiao, and DOES
1-5,

Defendants.

Case No.: 2:23-CV-01541-GW-
MAA

**JOINT MOTION FOR ENTRY
OF CONSENT JUDGMENT AND
PERMANENT INJUNCTION**

Date: [Date]
Time: [Time]
Ctm: [Ctm.]

Case Filed: March 1, 2023
Trial Date: N/A

Pursuant to Fed. R. Civ. P. 68(a), the parties, Plaintiffs Vita-Mix Corporation (“Vitamix Corp.”), Vita-Mix Management Corporation (“Vitamix Management”), and Vita-Mix Manufacturing Corporation (“Vitamix Manufacturing”) (collectively “Vitamix”) and Defendants Sanven Corp., Sanven Technology, Ltd., HK Sishun Trade Co., Shanghai Sishun E-commerce Co., Ltd, and Shanghai Sishun Mechanical Equipment Co., Ltd. (collectively “Defendants”) (together, Plaintiffs and Defendants may be referred to as the “Parties” or separately as a “Party”) have

1 agreed to the entry of judgment as set forth in the Consent Judgment and Permanent
2 Injunction submitted herewith. Accordingly, the parties respectfully request that the
3 Court enter judgment consistent with the terms stated therein.

4
5 Respectfully submitted,

6 /s/Christina Moser
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18 *Attorneys for Plaintiffs*

19 Dated: November 8, 2023

20 /s/Jacob A. Schroeder (by consent)
21 Jacob A. Schroeder (264717)
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28 Jacob.schroeder@finnegan.com

Attorney for Defendants

Dated: November 8, 2023

CERTIFICATE OF SERVICE

I, the undersigned, am employed in the county of Cuyahoga, State of Ohio. I am over the age of 18 and not a party to the within action; my business address is 127 Public Sq., Ste 2000, Cleveland, Ohio 44114.

On November 8, 2023, I caused to be served a copy of the following document:

**JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND
PERMANENT INJUNCTION**

on the parties in this action as follows:

- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Columbus, Ohio addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ by placing document(s) listed above in the care and custody of Ace Attorney Services for personal delivery to the person(s) at the address(es) set forth below. Proof of service to be filed after completion of service.
- ☒ by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

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I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed on November 8, 2023, at Cleveland, Ohio.

/s/ Christina J. Moser

Christina J. Moser